

EXHIBIT 11

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

L.W. et al.,)
by and through her parents and next friends,)
Samantha Williams and Brian Williams,)
)
Plaintiffs,)
)
v.)
)
JONATHAN SKRMETTI et al.,)
)
Defendants.)

No. 3:23-cv-00376
JUDGE RICHARDSON

DECLARATION OF CHLOE COLE

I, Chloe Cole, declare as follows:

1. I am 18 years old and am not a party to this action. I have actual knowledge of the following facts and, if called upon to testify to them, could and would do so competently. I am submitting this Declaration in support of Defendants' Opposition to Plaintiffs' Motion for a Preliminary Injunction.

2. Tennessee's law prohibiting medical procedures performed on minors "for the purpose of: (A) Enabling a minor to identify with, or live as a purported identity inconsistent with the minor's sex, or (B) Treating purported discomfort or distress from a discordance between the minor's sex and asserted identity," Tenn. Code Ann. § 68-33-101, *et seq.*, is a necessary and potentially life-saving regulation to protect vulnerable young people from the heartbreaking regret, irreversible physical changes, and emotional pain I have experienced.

3. I am a detransitioned woman from California who medically transitioned as a child. I grew up with ideal conditions for transitioning. I lived in an area where medical transition was easily accessible, had the support of family and a group of friends, and started treatment as young as possible. Yet, my transitioning was still a failure.

4. I began puberty very young, no older than 8 or 9. I had a lot of discomfort around my developing body. I was afraid to grow from a girl into a woman and experience things like periods, childbirth, and menopause. I only hear about how scary and painful being a woman was from other girls and older women. I never really had any strong female role models, and I never felt like I fit in with other girls, but I had a tomboyish streak influenced by my older brothers.

5. At the age of 12, I began to believe that I was transgender. I became obsessed about the idea of becoming a boy. I believed that my insecurities and anxieties about being a hypersexualized and vulnerable girl would magically disappear if I transitioned. At school, I also

had trouble making friends but saw the praise that coming out as “trans” gave people on Instagram and social media. I started socially transitioning from a girl into a male identity.

6. Soon after, I was diagnosed with gender dysphoria by a “gender specialist.” The gender specialist told my parents that children know their gender from a young age, and I know what’s best for myself. The mental health professionals did not try to dissuade me from my beliefs. At no point did anyone explore why I did not want to be a girl.

7. The doctors treated me like an adult who could make informed lifelong decisions. Yet, I was in 8th grade. I had no concept of what it would mean to me as an adult to have children someday. But this decision would affect every area of my life, from socialization and relationships to sexual function, and my ability to have children. I cannot imagine a doctor asking a child this and expecting them to make a mature judgment.

8. When speaking to my parents, the gender specialist cited the suicide rate, stating, “If you don’t affirm your child, she will commit suicide.” The provider asked, “Would you rather have a dead daughter or live son?” They did not present any other option to treat my dysphoria to me or to my parents. My distraught parents wanted me alive, so they listened to my doctors. However, I wasn’t suicidal until I underwent treatments.

9. Like many dysphoric children, I suffered from several mental health conditions, such as ADHD, and comorbidities, including undiagnosed autism and body dysmorphia.

10. Because I am autistic, I have more masculine behaviors and am more object-oriented than most girls. I have some social, cognitive, and sensory processing differences that made school and going through puberty a little more difficult. These struggles were all normal but were misrepresented as problems having to do with my gender.

11. Six months after my gender dysphoria diagnosis, I started puberty blockers. A month later, I was put on testosterone. I stayed on puberty blockers for a year and on testosterone for three years. When I received the hormones, the endocrinologist cited some of the risks, including vaginal atrophy and the inability to have children. However, I did not really understand what that would mean and didn't realize that it could involve other pelvic structures.

12. After I started the hormones, I began having severe hot flashes, like those in menopause. My entire body got very itchy. After a while I would sometimes hear loud cracks in my neck and back. The hormones caused an atrophy of my urinary tract. I suffered from urinary tract infections and blood clots in my urine. I also developed digestive problems. I also experienced a very heightened libido which was very difficult to deal with at such a young age. This caused me to make a lot of regrettable sexual decisions. However, I did not want to discontinue testosterone because I wanted to continue to be treated as a boy.

13. At 13, I started binding my breasts. A classmate groped me in 8th grade, and I never wanted it to happen again. After two years of binding, I began seeking a mastectomy to have my breasts removed. This process took only six months and did not require a psychological evaluation. I was simply referred to a surgeon by a gender specialist.

14. At 15, just after my sophomore year of high school ended, I had a double mastectomy. I had serious complications from the surgery. I have to wear bandages over my chest every day because the areola grafts on my mastectomy started to fail and leak fluid two years post-op.

15. About 11 months after my surgery, I began experiencing grief. I realized this was a mistake, that I had lost a part of my body. I won't be able to breastfeed my future children. While

doctors warned me about this, no teenager can grasp what that really means. I will never be able to bond in an important way with any future children. I might not be able to have children.

16. I became extremely depressed to the point of my grades and school attendance dropping, and I experienced severe paranoia and suicidal ideation. I had to drop out of high school several times. The longer I was on my medications, the worse my mental health became. I felt alienated and started to become suicidal for the first time. Although I did not act on my thoughts, they were taking a toll on me.

17. I broke down one night as it all came to a head and made the decision to stop the testosterone. I also dropped the male identification and began to identify again as female.

18. At first some things got worse. I had more UTIs, blood clots and sometimes tissue in my urine, and worse digestive issues. That has since gone away, but I still experience frequent urination, dehydration, and occasionally infections.

19. I was very emotionally volatile, and my suicidal ideation got worse. I became very sick and lost a lot of weight. My overall mental health got worse. I had to drop out of school and get a GED because I couldn't perform at school.

20. Over time my body began to readjust. My features resoftened. The fat in my body and body shape began to return to a female form and I have regained the weight.

21. Currently, my mental health is stable. The treatments were just band aids for my mental health issues. I still struggle, but my depression and anxiety have improved.

22. It should not have been an option for me to be prescribed hormone treatments that caused me harm and may have affected my fertility, or to have my healthy breasts removed at the age of 15.

23. The complications from puberty blockers, testosterone, and surgery still impact my day-to-day life in ways that I didn't even know were possible. The puberty blockers gave me joint and back pain, and the testosterone caused me to develop issues in my urinary tract. The status of my fertility is currently unknown.

24. I still experience gender dysphoria to this day. The only thing that has improved it long term was simply living in my body with no intervention or medication.

25. Tennessee's law banning these treatments is a crucial step in protecting children and their right to grow up into healthy adults who are able to live fulfilling lives.

I declare under penalty of perjury that the foregoing is true and corrected.

Executed on May 19, 2023.

/s/ Chloe Cole
Chloe Cole